



December 2, 2009

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123;
E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

Dear Ms. Dortch:

On November 30, 2009, Nicholas Alexander, William Dever, and Richard Hovey of the Wireline Competition Bureau conferenced by phone with Mark Goff, Fabio Campagna and I to discuss the impact of removing toll free numbers from the ITRS database.

Whether calling out or receiving calls, VP200 customers with their 800 numbers removed from the iTRS database are not connecting point to point with Snap!VRS Ojo customers; these calls are instead being automatically diverted to VRS. Snap!VRS explained that the majority of customers who experience these diverted point to point calls do not complain about it because of their being accustomed to long-standing and wide-spread interoperability challenges and because many of them mistakenly believe that the devices themselves are the problem rather than understanding it as a systemic issue.

In response to new information about the ability for a consumer to program a VP200 to display a local number instead of a toll free number, Snap!VRS said that the "real world" experience is that the majority if not virtually all VP 200 users do not adjust the settings of the video device, indeed many do not know the password required to access the device let alone how they can go about making these types of changes.

In addition, Snap!VRS explained that it has publicized toll free numbers for accessing its VRS or customer service as an alternative to connecting by using an URL. The consequence of removing those toll free numbers from the iTRS database is that hearing people would still be able to use those numbers to connect with our VRS or customer service using those numbers but users of video phones or other video conferencing modes dialing those numbers may have their calls diverted elsewhere.

Sincerely,

/s/

Jeff Rosen, General Counsel